# IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

**UNITED STATES OF AMERICA,** Plaintiff,

v.

CRIM. NO. 12-922 (PG)

[1] MARTIN THUNA, et al., Defendant.

### INFORMATIVE MOTION REGARDING DISCOVERY AND DESIGNATION

### TO THE HONORABLE COURT:

COMES NOW the United States of America, by and through the undersigned attorneys and before this Honorable Court, respectfully prays and states as follows:

- 1. Today the United States notified additional discovery in the case. Among additional discovery recently obtained by the United States, the discovery package includes the search warrant videos that were inadvertently omitted from some discovery packages.
- 2. In addition, included in the discovery are the forensic excerpts of emails obtained from the search warrant that are more easily readable and searchable for the defense attorneys. This report contains the emails listed in the designation of evidence.
- 3. During the course of the case the United States has received and responded to inquiries and from counsel for various defendants regarding the locations of some items in the discovery package.
  To date, the United States understands that no further requests are outstanding.

WHEREFORE, the United States respectfully requests that the Court take notice of the foregoing.

# RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 31st day of January, 2014.

ROSA EMILIA RODRIGUEZ-VELEZ United States Attorney

s\ Charles R. Walsh
Charles R. Walsh
Assistant U.S. Attorney
Torre Chardón, Room 1201
350 Carlos Chardón Avenue
San Juan, PR 00918
Tel. (787) 766-5656
e-mail: charles.walsh@usdoj.gov

# **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the attorney of record.

s\Charles R. Walsh
Charles R. Walsh
Assistant U.S. Attorney
Torre Chardón, Room 1201
350 Carlos Chardón Avenue
San Juan, PR 00918
Tel. (787) 766-5656
email: charles.walsh@usdoj.gov